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December 27, 2016

**Electronically filed via IBFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, DC 20554

**Re: Supplement to Karousel LLC, Applications for Satellite Space Station  
Authorizations, File No. SAT-LOA-20161115-00113**

Dear Ms. Dortch:

Karousel LLC ("Karousel") submits this letter to supplement its space-station application filed November 15, 2016.<sup>1</sup>

Section 25.146(a) directs applicants to provide a technical showing that "the proposed NGSO FSS system would not exceed the validation equivalent power flux-density (EPFD) limits as specified in section 25.208 (g), (k), and (l) for EPFD<sub>down</sub>, and EPFD<sub>up</sub>."<sup>2</sup> Karousel provided a detailed technical analysis showing compliance.<sup>3</sup> But the specific type of software analysis identified in section 25.146(a) – namely, PFD masks "generated in accordance with the specification stipulated in the most recent version of ITU-R Recommendation S.1503, 'Functional Description to be used in Developing Software Tools for Determining Conformity of Non-GSO FSS Networks with Limits Contained in Article 22 of the Radio Regulations'" – was unavailable at the time of submission. Karousel's Application therefore requested a six-week waiver of section 25.146(a) to allow the company to perform the precise PFD modeling described in the rules.<sup>4</sup> Attached is an analysis that shows PFD masks generated using the specification stipulated in the most recent version of ITU-R Recommendation S.1503.

Please contact me with any questions related to this letter.

Respectfully submitted,

/s/ Monish Kundra

Monish Kundra  
Vice President  
Karousel LLC

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<sup>1</sup> Karousel LLC, *Application for Satellite Space Station Authorizations*, File No. SAT-LOA-20161115-00113 (filed Nov. 15, 2016) ("Application").

<sup>2</sup> 47 C.F.R. § 25.146(a); Application at 64.

<sup>3</sup> See Application, Parts III.R, DD; Attachment 2.

<sup>4</sup> Application at 64.

Enclosure

CC: Jose Albuquerque  
Karl Kensigner  
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Stephen Duall